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February 23, 2024

VIA ECF

Honorable Gary R. Brown
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: UMB Bank, N.A. v. Amsterdam House Continuing Care Retirement Community, Inc., No. 2:23-cv-09226 (GRB)

Dear Judge Brown:

We write jointly on behalf of appellant UMB Bank, N.A., appellee Amsterdam House Continuing Care Retirement Community, Inc. (the “Debtor”), and appellee Life Care Services Communities LLC d/b/a LCS Real Estate (collectively, the “Parties”) to request a stay of all appellate deadlines.

A negotiated resolution has been reached on this matter. On February 20, 2024, the Debtor and the Official Committee of Unsecured Creditors filed a joint motion for entry of an order approving a settlement and compromise pursuant to Federal Rule of Bankruptcy Procedure 9019 (the “Settlement Motion”). See Bankr. Dkt. No. 669, attached hereto as Exhibit A. The Bankruptcy Court has set the Settlement Motion for hearing on March 18, 2024 at 1:30 PM ET. As a result, the Parties request that this Court stay all appellate deadlines pending the Bankruptcy Court’s decision on the Settlement Motion. The Parties will promptly advise this Court of the Bankruptcy Court’s decision.

[Signature page follows.]

Respectfully submitted,

**MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY AND POPEO, PC**

/s/ Dallas Gray Taylor
Dallas G. Taylor

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